

EXHIBIT 2

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

ARIEL ABITTAN,

PLAINTIFF,

v.

LILY CHAO (a/k/a TIFFANY CHEN, a/k/a
YUTING CHEN), DAMIEN DING (a/k/a
DAMIEN LEUNG, a/k/a DAMIEN RAY
DONOVAN, a/k/a TAO DING),
TEMUJIN LABS INC. (a Cayman Islands
corporation), and Does 1-100, inclusive,

DEFENDANTS.

Case No. 5:20-CV-09340-NC

**HANSEN LAW FIRM, P.C.'S
OBJECTIONS TO SUBPOENA TO
PRODUCE DOCUMENTS,
INFORMATION, OR OBJECTS OR TO
PERMIT INSPECTION OF PREMISES
IN A CIVIL ACTION**

Judge: Hon. Nathanael Cousins

Hansen Law Firm, P.C. (“HLF”), prior counsel in this matter for Defendants Lily Chao (“Chao”), Damien Ding (“Ding”), and Temujin Labs, Inc. (a Cayman Islands Corporation) (“Temujin Cayman”) (collectively, “Defendants”), hereby objects to Plaintiff Ariel Abittan (“Abittan” or “Propounding Party”)’s Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (“Document Subpoena”) as follows:

GENERAL OBJECTIONS

1. HLF objects to each request to the extent that it seeks materials that are neither relevant to the subject matter of this action nor reasonably calculated to lead to the discovery of admissible evidence.

2. HLF objects to each request to the extent that it seeks to impose any duties or obligations beyond those required by Applicable Law.

3. HLF objects to each request to the extent that it seeks information protected by the attorney-client privilege, work product privilege, right to privacy or any other applicable privilege. To the extent that a request may be construed as seeking such privileged or protected information or documents, HLF hereby claims such privileges and invokes such protections on behalf of its prior clients, Defendants, and on behalf of itself. Neither HLF’s failure to specifically object to a request on the grounds that it seeks such privileged or protected information or documents, nor the inadvertent production of documents that are protected by such privileges or protections, shall be deemed a waiver of the protection afforded by the attorney-client privilege, the work product doctrine, or any other applicable immunity, privilege, or protection.

4. HLF objects to each request to the extent that it contains inaccurate, incomplete and/or misleading assertions of any fact, events, allegations or pleadings. HLF’s responses to the requests do not and are not intended to reflect HLF’s agreement with or acquiescence in any such inaccuracies.

5. HLF objects to each request to the extent that it is overbroad, vague, ambiguous, unclear, and fails to describe the documents requested with reasonable particularity. This failure to describe documents with particularity is unduly burdensome and requires HLF to speculate as

1 to which documents Propounding Party seeks.

2 6. HLF objects to each request to the extent that it seeks documents already in
3 Propounding Party's possession, on the grounds that it subjects HLF to unreasonable and undue
4 burden and expense.

5 7. HLF objects to each request to the extent that it is duplicative of other requests
6 and is therefore unduly burdensome.

7 8. HLF objects to each request to the extent that it seeks documents in the
8 possession, custody or control of third parties. HLF shall produce only those documents in its
9 possession, custody or control.

10 9. To the extent possible, HLF will interpret all words and phrases in the requests
11 reasonably and in accordance with its understanding of their ordinary, usual and accepted
12 meanings. Nothing in any response should be taken as an admission of the existence,
13 admissibility, or genuineness of any document called for in a request. Any statement made by
14 HLF that a category of documents will be produced is not a representation that such documents
15 exist, but only that, if such documents exist, and can be located in the course of a reasonably
16 diligent search, they will be produced at a time, date, place and manner convenient to HLF and
17 mutually agreed to by the parties. Any extraordinary costs for production will be at the
18 propounding party's expense.

19 10. HLF objects to each request to the extent that it requires HLF to draw legal
20 conclusions.

21 11. These objections are based upon information presently available to HLF.

22 **OBJECTIONS TO DEFINITIONS IN REQUESTS FOR PRODUCTION**

23 1. HLF objects to the definition of "Action" as unreasonable, overly broad, unduly
24 burdensome, vague and ambiguous. "'Action' means the 'Actions' means the following lawsuits"
25 is nonsensical. HLF further objects to this definition to the extent that it requires the production
26 of information or documents that are not in HLF's possession, custody, or control, or information
27 or documents protected by the attorney-client privilege or any other privilege or protection,
28 including work product.

1 2. HLF objects to the definition of “Document” and “Documents” as unreasonable,
2 overly broad, unduly burdensome, vague and ambiguous. HLF also objects to the definition to the
3 extent that it encompasses materials beyond those encompassed by usage of that term under
4 Applicable Law. HLF further objects to this definition to the extent that it requires the production
5 of information or documents that are not in HLF’s possession, custody, or control, or information
6 or documents protected by the attorney-client privilege or any other privilege or protection,
7 including work product. HLF also objects to this definition to the extent its incorporation into the
8 requests renders them objectionable for the same reasons stated above. Where applicable, HLF
9 will give the term “Document” and “Documents” their plain and ordinary meaning.

10 3. HLF objects to the definitions of “Relating to,” “relating to,” “referring or relating
11 to,” and “related to” to the extent that they render the requests overbroad and unduly burdensome
12 or renders the requests vague or ambiguous. HLF further objects to these definitions to the extent
13 they exceed the ordinary meaning of the terms. HLF will give the terms “Relating to,” “relating
14 to,” “referring or relating to,” and “related to” their plain and ordinary meaning.

15 4. HLF objects to the definition of “You” and “Your” as unreasonable, overly broad,
16 unduly burdensome, vague and ambiguous. HLF further objects to this definition to the extent
17 that it requires the production of information or documents that are not in HLF’s possession,
18 custody, or control, or information or documents protected by the attorney-client privilege or any
19 other privilege or protection, including the attorney work product doctrine.

20 **OBJECTIONS TO INSTRUCTIONS IN REQUESTS FOR PRODUCTION**

21 1. HLF objects to Instruction No. 5 as it calls for the production of “Documents and
22 Things located in the personal files of any and all past or present directors, officers, principals,
23 managers, employees, attorneys, agents, representatives, contractors, consultants, or accountants
24 of Respondents.” Such an Instruction is overbroad and unduly burdensome, vague and ambiguous,
25 and requires the production of information or documents that are not in HLF’s possession, custody,
26 or control, or information or documents protected by the attorney-client privilege or any other
27 privilege or protection, including work product.

1 2. HLF objects to Instruction No. 6 as it is overbroad and unduly burdensome, vague
2 and ambiguous, and requires the production of information or documents that are not in HLF's
3 possession, custody, or control, or information or documents protected by the attorney-client
4 privilege or any other privilege or protection, including work product.

5 3. HLF objects to Instruction No. 7 as it is overbroad and unduly burdensome, vague
6 and ambiguous, and requires the production of information or documents that are not in HLF's
7 possession, custody, or control, or information or documents protected by the attorney-client
8 privilege or any other privilege or protection, including work product.

9 4. HLF objects to Instruction No. 8 as it is unduly burdensome.

10 5. HLF objects to Instruction No. 9 as it is unduly burdensome.

11 6. HLF objects to Instruction No. 11 as it is overbroad and unduly burdensome, vague
12 and ambiguous, and requires the production of information or documents that are not in HLF's
13 possession, custody, or control, or information or documents protected by the attorney-client
14 privilege or any other privilege or protection, including work product.

15 7. HLF objects to Instruction No. 12 as it is overbroad and unduly burdensome, vague
16 and ambiguous, and requires the production of information or documents that are not in HLF's
17 possession, custody, or control, or information or documents protected by the attorney-client
18 privilege or any other privilege or protection, including work product.

19 8. HLF objects to Instruction No. 13 as it is overbroad and unduly burdensome, vague
20 and ambiguous, and requires the production of information or documents that are not in HLF's
21 possession, custody, or control, or information or documents protected by the attorney-client
22 privilege or any other privilege or protection, including work product. Further, if HLF produces
23 any documents, such documents will be in electronic format.

24 9. HLF objects to Instruction No. 14 as it is overbroad and unduly burdensome, vague
25 and ambiguous, and requires the production of information or documents that are not in HLF's
26 possession, custody, or control, or information or documents protected by the attorney-client
27 privilege or any other privilege or protection, including work product. Further, if HLF produces
28 any documents, such documents will be in electronic format.

10. HLF objects to Instruction No. 15 as it is overbroad and unduly burdensome, vague and ambiguous, and requires the production of information or documents that are not in HLF's possession, custody, or control, or information or documents protected by the attorney-client privilege or any other privilege or protection, including work product. Further, if HLF produces any documents, such documents will be in electronic format.

11. HLF objects to Instruction No. 16 as it is overbroad and unduly burdensome, vague and ambiguous, and requires the production of information or documents that are not in HLF's possession, custody, or control, or information or documents protected by the attorney-client privilege or any other privilege or protection, including work product.

12. HLF objects to Instruction No. 18 as it is overbroad and unduly burdensome, vague and ambiguous, and requires the production of information or documents that are not in HLF's possession, custody, or control, or information or documents protected by the attorney-client privilege or any other privilege or protection, including work product.

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENTS NO. 1:

Documents sufficient to identify every litigation, arbitration, or regulatory proceeding in which You have represented any Party.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

HLF specifically incorporates by reference each of the general objections, objections to definitions, and objections to instructions noted above as though they were fully set forth herein.

HLF further objects that this request improperly seeks clearly protected information from prior opposing counsel, an action which the California courts have condemned as it "not only disrupts the adversarial system and lowers the standard of the profession, but it also adds to the already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the quality of client representation. Counsel should be free to devote his or her time and efforts to preparing the client's case without fear of being interrogated by his or her opponent. Moreover, the 'chilling effect' that such practice will have on the truthful communications from the client to

1 the attorney is obvious.” (*Id.*)

2 HLF further objects to the extent that the request seeks documents protected by the
3 attorney-client and/or attorney-work product privileges, and/or any other privileges.

4 HLF also objects to the extent that the request asks for confidential financial information
5 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
6 information protected by the right of privacy.

7 HLF further objects that the request is vague and ambiguous regarding the documents that
8 the request seeks.

9 HLF further objects that the request is overbroad and unduly burdensome.

10 HLF further objects that the request seeks documents not relevant and not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 HLF further objects that the request serves no purpose other than to harass the responding
13 party and the responding party’s former client(s), and propounding party has not exhausted all
14 reasonable alternative means for obtaining the information sought.

15 **REQUEST FOR PRODUCTION OF DOCUMENTS NO. 2:**

16 All retention agreements, engagement letters, or other contracts for legal representation
17 between You and any Party.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

19 HLF specifically incorporates by reference each of the general objections, objections to
20 definitions, and objections to instructions noted above as though they were fully set forth herein.

21 HLF further objects that this request improperly seeks clearly protected information from
22 prior opposing counsel, an action which the California courts have condemned as it “not only
23 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
24 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
25 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
26 quality of client representation. Counsel should be free to devote his or her time and efforts to
27 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
28 the ‘chilling effect’ that such practice will have on the truthful communications from the client to

1 the attorney is obvious.” (*Id.*)

2 HLF further objects to the extent that the request seeks documents protected by the
3 attorney-client and/or attorney-work product privileges, and/or any other privileges.

4 HLF also objects to the extent that the request asks for confidential financial information
5 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
6 information protected by the right of privacy.

7 HLF further objects that the request is vague and ambiguous regarding the documents that
8 the request seeks.

9 HLF further objects that the request is overbroad and unduly burdensome.

10 HLF further objects that the request seeks documents not relevant and not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 HLF further objects that the request serves no purpose other than to harass the responding
13 party and the responding party’s former client(s), and propounding party has not exhausted all
14 reasonable alternative means for obtaining the information sought.

15 **REQUEST FOR PRODUCTION NO. 3:**

16 All Documents indicating the reasons for the termination of Your legal representation of
17 any Party.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

19 HLF specifically incorporates by reference each of the general objections, objections to
20 definitions, and objections to instructions noted above as though they were fully set forth herein.

21 HLF further objects that this request improperly seeks clearly protected information from
22 prior opposing counsel, an action which the California courts have condemned as it “not only
23 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
24 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
25 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
26 quality of client representation. Counsel should be free to devote his or her time and efforts to
27 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
28 the ‘chilling effect’ that such practice will have on the truthful communications from the client to

1 the attorney is obvious.” (*Id.*)

2 HLF further objects to the extent that the request seeks documents protected by the
3 attorney-client and/or attorney-work product privileges, and/or any other privileges.

4 HLF also objects to the extent that the request asks for confidential financial information
5 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
6 information protected by the right of privacy.

7 HLF further objects that the request is vague and ambiguous regarding the documents that
8 the request seeks.

9 HLF further objects that the request is overbroad and unduly burdensome.

10 HLF further objects that the request seeks documents not relevant and not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 HLF further objects that the request serves no purpose other than to harass the responding
13 party and the responding party’s former client(s), and propounding party has not exhausted all
14 reasonable alternative means for obtaining the information sought.

15 **REQUEST FOR PRODUCTION NO. 4:**

16 Documents sufficient to show the amount, date, time, payor(s), sending bank(s), account
17 holder(s), currency, and reasons for every payment from any Party to You.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

19 HLF specifically incorporates by reference each of the general objections, objections to
20 definitions, and objections to instructions noted above as though they were fully set forth herein.

21 HLF further objects that this request improperly seeks clearly protected information from
22 prior opposing counsel, an action which the California courts have condemned as it “not only
23 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
24 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
25 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
26 quality of client representation. Counsel should be free to devote his or her time and efforts to
27 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
28 the ‘chilling effect’ that such practice will have on the truthful communications from the client to

1 the attorney is obvious.” (*Id.*)

2 HLF further objects to the extent that the request seeks documents protected by the
3 attorney-client and/or attorney-work product privileges, and/or any other privileges.

4 HLF also objects to the extent that the request asks for confidential financial information
5 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
6 information protected by the right of privacy.

7 HLF further objects that the request is vague and ambiguous regarding the documents that
8 the request seeks.

9 HLF further objects that the request is overbroad and unduly burdensome.

10 HLF further objects that the request seeks documents not relevant and not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 HLF further objects that the request serves no purpose other than to harass the responding
13 party and the responding party’s former client(s), and propounding party has not exhausted all
14 reasonable alternative means for obtaining the information sought.

15 **REQUEST FOR PRODUCTION NO. 5:**

16 All Documents indicating the legal names, dates of birth, citizenships, immigration
17 statuses, residences, employer(s), or place(s) of employment of any Party who is a natural person.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

19 HLF specifically incorporates by reference each of the general objections, objections to
20 definitions, and objections to instructions noted above as though they were fully set forth herein.

21 HLF further objects that this request improperly seeks clearly protected information from
22 prior opposing counsel, an action which the California courts have condemned as it “not only
23 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
24 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
25 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
26 quality of client representation. Counsel should be free to devote his or her time and efforts to
27 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
28 the ‘chilling effect’ that such practice will have on the truthful communications from the client to

1 the attorney is obvious.” (*Id.*)

2 HLF further objects to the extent that the request seeks documents protected by the
3 attorney-client and/or attorney-work product privileges, and/or any other privileges.

4 HLF also objects to the extent that the request asks for confidential financial information
5 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
6 information protected by the right of privacy.

7 HLF further objects that the request is vague and ambiguous regarding the documents that
8 the request seeks.

9 HLF further objects that the request is overbroad and unduly burdensome.

10 HLF further objects that the request seeks documents not relevant and not reasonably
11 calculated to lead to the discovery of admissible evidence.

12 HLF further objects that the request serves no purpose other than to harass the responding
13 party and the responding party’s former client(s), and propounding party has not exhausted all
14 reasonable alternative means for obtaining the information sought.

15 **REQUEST FOR PRODUCTION NO. 6:**

16 All Documents related to Ariel Abittan.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

18 HLF specifically incorporates by reference each of the general objections, objections to
19 definitions, and objections to instructions noted above as though they were fully set forth herein.

20 HLF further objects that this request improperly seeks clearly protected information from
21 prior opposing counsel, an action which the California courts have condemned as it “not only
22 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
23 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
24 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
25 quality of client representation. Counsel should be free to devote his or her time and efforts to
26 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
27 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
28 the attorney is obvious.” (*Id.*)

1 HLF further objects to the extent that the request seeks documents protected by the
2 attorney-client and/or attorney-work product privileges, and/or any other privileges.

3 HLF also objects to the extent that the request asks for confidential financial information
4 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
5 information protected by the right of privacy.

6 HLF further objects that the request is vague and ambiguous regarding the documents that
7 the request seeks.

8 HLF further objects that the request is overbroad and unduly burdensome.

9 HLF further objects that the request seeks documents not relevant and not reasonably
10 calculated to lead to the discovery of admissible evidence.

11 HLF further objects that the request serves no purpose other than to harass the responding
12 party and the responding party's former client(s), and propounding party has not exhausted all
13 reasonable alternative means for obtaining the information sought.

14 **REQUEST FOR PRODUCTION NO. 7:**

15 All Documents related to Yuting Chen.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

17 HLF specifically incorporates by reference each of the general objections, objections to
18 definitions, and objections to instructions noted above as though they were fully set forth herein.

19 HLF further objects that this request improperly seeks clearly protected information from
20 prior opposing counsel, an action which the California courts have condemned as it "not only
21 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
22 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
23 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
24 quality of client representation. Counsel should be free to devote his or her time and efforts to
25 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
26 the 'chilling effect' that such practice will have on the truthful communications from the client to
27 the attorney is obvious." (*Id.*)

28 HLF further objects to the extent that the request seeks documents protected by the

1 attorney-client and/or attorney-work product privileges, and/or any other privileges.

2 HLF also objects to the extent that the request asks for confidential financial information
3 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
4 information protected by the right of privacy.

5 HLF further objects that the request is vague and ambiguous regarding the documents that
6 the request seeks.

7 HLF further objects that the request is overbroad and unduly burdensome.

8 HLF further objects that the request seeks documents not relevant and not reasonably
9 calculated to lead to the discovery of admissible evidence.

10 HLF further objects that the request serves no purpose other than to harass the responding
11 party and the responding party's former client(s), and propounding party has not exhausted all
12 reasonable alternative means for obtaining the information sought.

13 **REQUEST FOR PRODUCTION NO. 8:**

14 All Documents related to Lily Chao.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

16 HLF specifically incorporates by reference each of the general objections, objections to
17 definitions, and objections to instructions noted above as though they were fully set forth herein.

18 HLF further objects that this request improperly seeks clearly protected information from
19 prior opposing counsel, an action which the California courts have condemned as it "not only
20 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
21 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
22 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
23 quality of client representation. Counsel should be free to devote his or her time and efforts to
24 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
25 the 'chilling effect' that such practice will have on the truthful communications from the client to
26 the attorney is obvious." (*Id.*)

27 HLF further objects to the extent that the request seeks documents protected by the
28 attorney-client and/or attorney-work product privileges, and/or any other privileges.

1 HLF also objects to the extent that the request asks for confidential financial information
2 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
3 information protected by the right of privacy.

4 HLF further objects that the request is vague and ambiguous regarding the documents that
5 the request seeks.

6 HLF further objects that the request is overbroad and unduly burdensome.

7 HLF further objects that the request seeks documents not relevant and not reasonably
8 calculated to lead to the discovery of admissible evidence.

9 HLF further objects that the request serves no purpose other than to harass the responding
10 party and the responding party's former client(s), and propounding party has not exhausted all
11 reasonable alternative means for obtaining the information sought.

12 **REQUEST FOR PRODUCTION NO. 9:**

13 All Documents related to Tao Ding.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

15 HLF specifically incorporates by reference each of the general objections, objections to
16 definitions, and objections to instructions noted above as though they were fully set forth herein.

17 HLF further objects that this request improperly seeks clearly protected information from
18 prior opposing counsel, an action which the California courts have condemned as it "not only
19 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
20 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
21 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
22 quality of client representation. Counsel should be free to devote his or her time and efforts to
23 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
24 the 'chilling effect' that such practice will have on the truthful communications from the client to
25 the attorney is obvious." (*Id.*)

26 HLF further objects to the extent that the request seeks documents protected by the
27 attorney-client and/or attorney-work product privileges, and/or any other privileges.

28 HLF also objects to the extent that the request asks for confidential financial information

1 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
2 information protected by the right of privacy.

3 HLF further objects that the request is vague and ambiguous regarding the documents that
4 the request seeks.

5 HLF further objects that the request is overbroad and unduly burdensome.

6 HLF further objects that the request seeks documents not relevant and not reasonably
7 calculated to lead to the discovery of admissible evidence.

8 HLF further objects that the request serves no purpose other than to harass the responding
9 party and the responding party's former client(s), and propounding party has not exhausted all
10 reasonable alternative means for obtaining the information sought.

11 **REQUEST FOR PRODUCTION NO. 10:**

12 All Documents related to Damien Ding.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

14 HLF specifically incorporates by reference each of the general objections, objections to
15 definitions, and objections to instructions noted above as though they were fully set forth herein.

16 HLF further objects that this request improperly seeks clearly protected information from
17 prior opposing counsel, an action which the California courts have condemned as it "not only
18 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
19 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
20 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
21 quality of client representation. Counsel should be free to devote his or her time and efforts to
22 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
23 the 'chilling effect' that such practice will have on the truthful communications from the client to
24 the attorney is obvious." (*Id.*)

25 HLF further objects to the extent that the request seeks documents protected by the
26 attorney-client and/or attorney-work product privileges, and/or any other privileges.

27 HLF also objects to the extent that the request asks for confidential financial information
28 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks

1 information protected by the right of privacy.

2 HLF further objects that the request is vague and ambiguous regarding the documents that
3 the request seeks.

4 HLF further objects that the request is overbroad and unduly burdensome.

5 HLF further objects that the request seeks documents not relevant and not reasonably
6 calculated to lead to the discovery of admissible evidence.

7 HLF further objects that the request serves no purpose other than to harass the responding
8 party and the responding party's former client(s), and propounding party has not exhausted all
9 reasonable alternative means for obtaining the information sought.

10 **REQUEST FOR PRODUCTION NO. 11:**

11 All Documents related to Damien Leung.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

13 HLF specifically incorporates by reference each of the general objections, objections to
14 definitions, and objections to instructions noted above as though they were fully set forth herein.

15 HLF further objects that this request improperly seeks clearly protected information from
16 prior opposing counsel, an action which the California courts have condemned as it "not only
17 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
18 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
19 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
20 quality of client representation. Counsel should be free to devote his or her time and efforts to
21 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
22 the 'chilling effect' that such practice will have on the truthful communications from the client to
23 the attorney is obvious." (*Id.*)

24 HLF further objects to the extent that the request seeks documents protected by the
25 attorney-client and/or attorney-work product privileges, and/or any other privileges.

26 HLF also objects to the extent that the request asks for confidential financial information
27 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
28 information protected by the right of privacy.

1 HLF further objects that the request is vague and ambiguous regarding the documents that
2 the request seeks.

3 HLF further objects that the request is overbroad and unduly burdensome.

4 HLF further objects that the request seeks documents not relevant and not reasonably
5 calculated to lead to the discovery of admissible evidence.

6 HLF further objects that the request serves no purpose other than to harass the responding
7 party and the responding party's former client(s), and propounding party has not exhausted all
8 reasonable alternative means for obtaining the information sought.

9 **REQUEST FOR PRODUCTION NO. 12:**

10 All Documents related to Juniper Ventures Incorporated.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

12 HLF specifically incorporates by reference each of the general objections, objections to
13 definitions, and objections to instructions noted above as though they were fully set forth herein.

14 HLF further objects that this request improperly seeks clearly protected information from
15 prior opposing counsel, an action which the California courts have condemned as it "not only
16 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
17 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
18 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
19 quality of client representation. Counsel should be free to devote his or her time and efforts to
20 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
21 the 'chilling effect' that such practice will have on the truthful communications from the client to
22 the attorney is obvious." (*Id.*)

23 HLF further objects to the extent that the request seeks documents protected by the
24 attorney-client and/or attorney-work product privileges, and/or any other privileges.

25 HLF also objects to the extent that the request asks for confidential financial information
26 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
27 information protected by the right of privacy.

28 HLF further objects that the request is vague and ambiguous regarding the documents that

1 the request seeks.

2 HLF further objects that the request is overbroad and unduly burdensome.

3 HLF further objects that the request seeks documents not relevant and not reasonably
4 calculated to lead to the discovery of admissible evidence.

5 HLF further objects that the request serves no purpose other than to harass the responding
6 party and the responding party's former client(s), and propounding party has not exhausted all
7 reasonable alternative means for obtaining the information sought.

8 **REQUEST FOR PRODUCTION NO. 13:**

9 All Documents related to Project Revolution Fund Inc.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

11 HLF specifically incorporates by reference each of the general objections, objections to
12 definitions, and objections to instructions noted above as though they were fully set forth herein.

13 HLF further objects that this request improperly seeks clearly protected information from
14 prior opposing counsel, an action which the California courts have condemned as it "not only
15 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
16 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
17 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
18 quality of client representation. Counsel should be free to devote his or her time and efforts to
19 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
20 the 'chilling effect' that such practice will have on the truthful communications from the client to
21 the attorney is obvious." (*Id.*)

22 HLF further objects to the extent that the request seeks documents protected by the
23 attorney-client and/or attorney-work product privileges, and/or any other privileges.

24 HLF also objects to the extent that the request asks for confidential financial information
25 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
26 information protected by the right of privacy.

27 HLF further objects that the request is vague and ambiguous regarding the documents that
28 the request seeks.

1 HLF further objects that the request is overbroad and unduly burdensome.

2 HLF further objects that the request seeks documents not relevant and not reasonably
3 calculated to lead to the discovery of admissible evidence.

4 HLF further objects that the request serves no purpose other than to harass the responding
5 party and the responding party's former client(s), and propounding party has not exhausted all
6 reasonable alternative means for obtaining the information sought.

7 **REQUEST FOR PRODUCTION NO. 14:**

8 All Documents related to Juniper Venture Holdings LLC.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

10 HLF specifically incorporates by reference each of the general objections, objections to
11 definitions, and objections to instructions noted above as though they were fully set forth herein.

12 HLF further objects that this request improperly seeks clearly protected information from
13 prior opposing counsel, an action which the California courts have condemned as it "not only
14 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
15 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
16 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
17 quality of client representation. Counsel should be free to devote his or her time and efforts to
18 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
19 the 'chilling effect' that such practice will have on the truthful communications from the client to
20 the attorney is obvious." (*Id.*)

21 HLF further objects to the extent that the request seeks documents protected by the
22 attorney-client and/or attorney-work product privileges, and/or any other privileges.

23 HLF also objects to the extent that the request asks for confidential financial information
24 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
25 information protected by the right of privacy.

26 HLF further objects that the request is vague and ambiguous regarding the documents that
27 the request seeks.

28 HLF further objects that the request is overbroad and unduly burdensome.

1 HLF further objects that the request seeks documents not relevant and not reasonably
2 calculated to lead to the discovery of admissible evidence.

3 HLF further objects that the request serves no purpose other than to harass the responding
4 party and the responding party's former client(s), and propounding party has not exhausted all
5 reasonable alternative means for obtaining the information sought.

6 **REQUEST FOR PRODUCTION NO. 15:**

7 All Documents related to Juniper Venture Partners LLC.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

9 HLF specifically incorporates by reference each of the general objections, objections to
10 definitions, and objections to instructions noted above as though they were fully set forth herein.

11 HLF further objects that this request improperly seeks clearly protected information from
12 prior opposing counsel, an action which the California courts have condemned as it "not only
13 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
14 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
15 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
16 quality of client representation. Counsel should be free to devote his or her time and efforts to
17 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
18 the 'chilling effect' that such practice will have on the truthful communications from the client to
19 the attorney is obvious." (*Id.*)

20 HLF further objects to the extent that the request seeks documents protected by the
21 attorney-client and/or attorney-work product privileges, and/or any other privileges.

22 HLF also objects to the extent that the request asks for confidential financial information
23 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
24 information protected by the right of privacy.

25 HLF further objects that the request is vague and ambiguous regarding the documents that
26 the request seeks.

27 HLF further objects that the request is overbroad and unduly burdensome.

28 HLF further objects that the request seeks documents not relevant and not reasonably

1 calculated to lead to the discovery of admissible evidence.

2 HLF further objects that the request serves no purpose other than to harass the responding
3 party and the responding party's former client(s), and propounding party has not exhausted all
4 reasonable alternative means for obtaining the information sought.

5 **REQUEST FOR PRODUCTION NO. 16:**

6 All Documents related to Eian Labs Inc. (f/k/a Porepsus Inc.)

7 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

8 HLF specifically incorporates by reference each of the general objections, objections to
9 definitions, and objections to instructions noted above as though they were fully set forth herein.

10 HLF further objects that this request improperly seeks clearly protected information from
11 prior opposing counsel, an action which the California courts have condemned as it "not only
12 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
13 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
14 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
15 quality of client representation. Counsel should be free to devote his or her time and efforts to
16 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
17 the 'chilling effect' that such practice will have on the truthful communications from the client to
18 the attorney is obvious." (*Id.*)

19 HLF further objects to the extent that the request seeks documents protected by the
20 attorney-client and/or attorney-work product privileges, and/or any other privileges.

21 HLF also objects to the extent that the request asks for confidential financial information
22 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
23 information protected by the right of privacy.

24 HLF further objects that the request is vague and ambiguous regarding the documents that
25 the request seeks.

26 HLF further objects that the request is overbroad and unduly burdensome.

27 HLF further objects that the request seeks documents not relevant and not reasonably
28 calculated to lead to the discovery of admissible evidence.

1 HLF further objects that the request serves no purpose other than to harass the responding
2 party and the responding party's former client(s), and propounding party has not exhausted all
3 reasonable alternative means for obtaining the information sought.

4 **REQUEST FOR PRODUCTION NO. 17:**

5 All Documents related to Fourhair LLC.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

7 HLF specifically incorporates by reference each of the general objections, objections to
8 definitions, and objections to instructions noted above as though they were fully set forth herein.

9 HLF further objects that this request improperly seeks clearly protected information from
10 prior opposing counsel, an action which the California courts have condemned as it "not only
11 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
12 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
13 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
14 quality of client representation. Counsel should be free to devote his or her time and efforts to
15 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
16 the 'chilling effect' that such practice will have on the truthful communications from the client to
17 the attorney is obvious." (*Id.*)

18 HLF further objects to the extent that the request seeks documents protected by the
19 attorney-client and/or attorney-work product privileges, and/or any other privileges.

20 HLF also objects to the extent that the request asks for confidential financial information
21 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
22 information protected by the right of privacy.

23 HLF further objects that the request is vague and ambiguous regarding the documents that
24 the request seeks.

25 HLF further objects that the request is overbroad and unduly burdensome.

26 HLF further objects that the request seeks documents not relevant and not reasonably
27 calculated to lead to the discovery of admissible evidence.

28 HLF further objects that the request serves no purpose other than to harass the responding

1 party and the responding party's former client(s), and propounding party has not exhausted all
2 reasonable alternative means for obtaining the information sought.

3 **REQUEST FOR PRODUCTION NO. 18:**

4 All Documents related to Lakeside Garden Heritage LLC.

5 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

6 HLF specifically incorporates by reference each of the general objections, objections to
7 definitions, and objections to instructions noted above as though they were fully set forth herein.

8 HLF further objects that this request improperly seeks clearly protected information from
9 prior opposing counsel, an action which the California courts have condemned as it "not only
10 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
11 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
12 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
13 quality of client representation. Counsel should be free to devote his or her time and efforts to
14 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
15 the 'chilling effect' that such practice will have on the truthful communications from the client to
16 the attorney is obvious." (*Id.*)

17 HLF further objects to the extent that the request seeks documents protected by the
18 attorney-client and/or attorney-work product privileges, and/or any other privileges.

19 HLF also objects to the extent that the request asks for confidential financial information
20 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
21 information protected by the right of privacy.

22 HLF further objects that the request is vague and ambiguous regarding the documents that
23 the request seeks.

24 HLF further objects that the request is overbroad and unduly burdensome.

25 HLF further objects that the request seeks documents not relevant and not reasonably
26 calculated to lead to the discovery of admissible evidence.

27 HLF further objects that the request serves no purpose other than to harass the responding
28 party and the responding party's former client(s), and propounding party has not exhausted all

1 reasonable alternative means for obtaining the information sought.

2 **REQUEST FOR PRODUCTION NO. 19:**

3 All Documents related to Powerscale Capital Management LLC.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

5 HLF specifically incorporates by reference each of the general objections, objections to
6 definitions, and objections to instructions noted above as though they were fully set forth herein.

7 HLF further objects that this request improperly seeks clearly protected information from
8 prior opposing counsel, an action which the California courts have condemned as it “not only
9 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
10 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
11 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
12 quality of client representation. Counsel should be free to devote his or her time and efforts to
13 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
14 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
15 the attorney is obvious.” (*Id.*)

16 HLF further objects to the extent that the request seeks documents protected by the
17 attorney-client and/or attorney-work product privileges, and/or any other privileges.

18 HLF also objects to the extent that the request asks for confidential financial information
19 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
20 information protected by the right of privacy.

21 HLF further objects that the request is vague and ambiguous regarding the documents that
22 the request seeks.

23 HLF further objects that the request is overbroad and unduly burdensome.

24 HLF further objects that the request seeks documents not relevant and not reasonably
25 calculated to lead to the discovery of admissible evidence.

26 HLF further objects that the request serves no purpose other than to harass the responding
27 party and the responding party’s former client(s), and propounding party has not exhausted all
28 reasonable alternative means for obtaining the information sought.

REQUEST FOR PRODUCTION NO. 20:

All Documents related to Powerscale Capital Fund LP.

RESPONSE TO REQUEST FOR PRODUCTION NO. 20:

HLF specifically incorporates by reference each of the general objections, objections to definitions, and objections to instructions noted above as though they were fully set forth herein.

HLF further objects that this request improperly seeks clearly protected information from prior opposing counsel, an action which the California courts have condemned as it “not only disrupts the adversarial system and lowers the standard of the profession, but it also adds to the already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the quality of client representation. Counsel should be free to devote his or her time and efforts to preparing the client’s case without fear of being interrogated by his or her opponent. Moreover, the ‘chilling effect’ that such practice will have on the truthful communications from the client to the attorney is obvious.” (*Id.*)

HLF further objects to the extent that the request seeks documents protected by the attorney-client and/or attorney-work product privileges, and/or any other privileges.

HLF also objects to the extent that the request asks for confidential financial information protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks information protected by the right of privacy.

HLF further objects that the request is vague and ambiguous regarding the documents that the request seeks.

HLF further objects that the request is overbroad and unduly burdensome.

HLF further objects that the request seeks documents not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

HLF further objects that the request serves no purpose other than to harass the responding party and the responding party’s former client(s), and propounding party has not exhausted all reasonable alternative means for obtaining the information sought.

1 **REQUEST FOR PRODUCTION NO. 21:**

2 All Documents related to Black Cobble Rideshare Funding LLC.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

1 **REQUEST FOR PRODUCTION NO. 22:**

2 All Documents related to Temujin Labs Inc. (Delaware)

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

1 **REQUEST FOR PRODUCTION NO. 23:**

2 All Documents related to Temujin Labs Inc. (Cayman)

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 23:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

1 **REQUEST FOR PRODUCTION NO. 24:**

2 All Documents related to Nessco Investments, LLC.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 24:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

REQUEST FOR PRODUCTION NO. 25:

All Documents related to Findora Foundation Ltd.

RESPONSE TO REQUEST FOR PRODUCTION NO. 25:

HLF specifically incorporates by reference each of the general objections, objections to definitions, and objections to instructions noted above as though they were fully set forth herein.

HLF further objects that this request improperly seeks clearly protected information from prior opposing counsel, an action which the California courts have condemned as it “not only disrupts the adversarial system and lowers the standard of the profession, but it also adds to the already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the quality of client representation. Counsel should be free to devote his or her time and efforts to preparing the client’s case without fear of being interrogated by his or her opponent. Moreover, the ‘chilling effect’ that such practice will have on the truthful communications from the client to the attorney is obvious.” (*Id.*)

HLF further objects to the extent that the request seeks documents protected by the attorney-client and/or attorney-work product privileges, and/or any other privileges.

HLF also objects to the extent that the request asks for confidential financial information protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks information protected by the right of privacy.

HLF further objects that the request is vague and ambiguous regarding the documents that the request seeks.

HLF further objects that the request is overbroad and unduly burdensome.

HLF further objects that the request seeks documents not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

HLF further objects that the request serves no purpose other than to harass the responding party and the responding party’s former client(s), and propounding party has not exhausted all reasonable alternative means for obtaining the information sought.

1 **REQUEST FOR PRODUCTION NO. 26:**

2 All Documents related to Discreet Labs, Ltd.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 26:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

REQUEST FOR PRODUCTION NO. 27:

All Documents related to Guanghai Liang.

RESPONSE TO REQUEST FOR PRODUCTION NO. 27:

HLF specifically incorporates by reference each of the general objections, objections to definitions, and objections to instructions noted above as though they were fully set forth herein.

HLF further objects that this request improperly seeks clearly protected information from prior opposing counsel, an action which the California courts have condemned as it “not only disrupts the adversarial system and lowers the standard of the profession, but it also adds to the already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the quality of client representation. Counsel should be free to devote his or her time and efforts to preparing the client’s case without fear of being interrogated by his or her opponent. Moreover, the ‘chilling effect’ that such practice will have on the truthful communications from the client to the attorney is obvious.” (*Id.*)

HLF further objects to the extent that the request seeks documents protected by the attorney-client and/or attorney-work product privileges, and/or any other privileges.

HLF also objects to the extent that the request asks for confidential financial information protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks information protected by the right of privacy.

HLF further objects that the request is vague and ambiguous regarding the documents that the request seeks.

HLF further objects that the request is overbroad and unduly burdensome.

HLF further objects that the request seeks documents not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

HLF further objects that the request serves no purpose other than to harass the responding party and the responding party’s former client(s), and propounding party has not exhausted all reasonable alternative means for obtaining the information sought.

1 **REQUEST FOR PRODUCTION NO. 28:**

2 All Documents related to Yang Yang.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 28:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

REQUEST FOR PRODUCTION NO. 29:

All Documents related to Alex Wang.

RESPONSE TO REQUEST FOR PRODUCTION NO. 29:

HLF specifically incorporates by reference each of the general objections, objections to definitions, and objections to instructions noted above as though they were fully set forth herein.

HLF further objects that this request improperly seeks clearly protected information from prior opposing counsel, an action which the California courts have condemned as it “not only disrupts the adversarial system and lowers the standard of the profession, but it also adds to the already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the quality of client representation. Counsel should be free to devote his or her time and efforts to preparing the client’s case without fear of being interrogated by his or her opponent. Moreover, the ‘chilling effect’ that such practice will have on the truthful communications from the client to the attorney is obvious.” (*Id.*)

HLF further objects to the extent that the request seeks documents protected by the attorney-client and/or attorney-work product privileges, and/or any other privileges.

HLF also objects to the extent that the request asks for confidential financial information protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks information protected by the right of privacy.

HLF further objects that the request is vague and ambiguous regarding the documents that the request seeks.

HLF further objects that the request is overbroad and unduly burdensome.

HLF further objects that the request seeks documents not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

HLF further objects that the request serves no purpose other than to harass the responding party and the responding party’s former client(s), and propounding party has not exhausted all reasonable alternative means for obtaining the information sought.

REQUEST FOR PRODUCTION NO. 30:

All Documents related to Selena Chen.

RESPONSE TO REQUEST FOR PRODUCTION NO. 30:

HLF specifically incorporates by reference each of the general objections, objections to definitions, and objections to instructions noted above as though they were fully set forth herein.

HLF further objects that this request improperly seeks clearly protected information from prior opposing counsel, an action which the California courts have condemned as it “not only disrupts the adversarial system and lowers the standard of the profession, but it also adds to the already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the quality of client representation. Counsel should be free to devote his or her time and efforts to preparing the client’s case without fear of being interrogated by his or her opponent. Moreover, the ‘chilling effect’ that such practice will have on the truthful communications from the client to the attorney is obvious.” (*Id.*)

HLF further objects to the extent that the request seeks documents protected by the attorney-client and/or attorney-work product privileges, and/or any other privileges.

HLF also objects to the extent that the request asks for confidential financial information protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks information protected by the right of privacy.

HLF further objects that the request is vague and ambiguous regarding the documents that the request seeks.

HLF further objects that the request is overbroad and unduly burdensome.

HLF further objects that the request seeks documents not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

HLF further objects that the request serves no purpose other than to harass the responding party and the responding party’s former client(s), and propounding party has not exhausted all reasonable alternative means for obtaining the information sought.

1 **REQUEST FOR PRODUCTION NO. 31:**

2 All Documents related to Jianrong Wang.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 31:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

1 **REQUEST FOR PRODUCTION NO. 32:**

2 All Documents related to Xilei Wang.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 32:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

1 **REQUEST FOR PRODUCTION NO. 33:**

2 All Documents related to Yi Chung Yang.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 33:**

4 HLF specifically incorporates by reference each of the general objections, objections to
5 definitions, and objections to instructions noted above as though they were fully set forth herein.

6 HLF further objects that this request improperly seeks clearly protected information from
7 prior opposing counsel, an action which the California courts have condemned as it “not only
8 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
9 already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198
10 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the
11 quality of client representation. Counsel should be free to devote his or her time and efforts to
12 preparing the client’s case without fear of being interrogated by his or her opponent. Moreover,
13 the ‘chilling effect’ that such practice will have on the truthful communications from the client to
14 the attorney is obvious.” (*Id.*)

15 HLF further objects to the extent that the request seeks documents protected by the
16 attorney-client and/or attorney-work product privileges, and/or any other privileges.

17 HLF also objects to the extent that the request asks for confidential financial information
18 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
19 information protected by the right of privacy.

20 HLF further objects that the request is vague and ambiguous regarding the documents that
21 the request seeks.

22 HLF further objects that the request is overbroad and unduly burdensome.

23 HLF further objects that the request seeks documents not relevant and not reasonably
24 calculated to lead to the discovery of admissible evidence.

25 HLF further objects that the request serves no purpose other than to harass the responding
26 party and the responding party’s former client(s), and propounding party has not exhausted all
27 reasonable alternative means for obtaining the information sought.
28

REQUEST FOR PRODUCTION NO. 34:

To the extent not responsive to any other request herein, all Documents related to the Complaint, filed by TEMUJIN LABS INC., a Delaware Corporation, on November 6, 2020, in *Temujin Labs Inc. v. Ariel Abittan, et al.*, Superior Court of California, Santa Clara County, Case No. 20-cv-372622.

RESPONSE TO REQUEST FOR PRODUCTION NO. 34:

HLF specifically incorporates by reference each of the general objections, objections to definitions, and objections to instructions noted above as though they were fully set forth herein.

HLF further objects that this request improperly seeks clearly protected information from prior opposing counsel, an action which the California courts have condemned as it “not only disrupts the adversarial system and lowers the standard of the profession, but it also adds to the already burdensome time and costs of litigation.” (*Spectra-Physics, Inc. v. Superior Court*, 198 Cal.App.3d 1487, 1494 (1988).) “[T]he practice of deposing opposing counsel detracts from the quality of client representation. Counsel should be free to devote his or her time and efforts to preparing the client’s case without fear of being interrogated by his or her opponent. Moreover, the ‘chilling effect’ that such practice will have on the truthful communications from the client to the attorney is obvious.” (*Id.*)

HLF further objects to the extent that the request seeks documents protected by the attorney-client and/or attorney-work product privileges, and/or any other privileges.

HLF also objects to the extent that the request asks for confidential financial information protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks information protected by the right of privacy.

HLF further objects that the request is vague and ambiguous regarding the documents that the request seeks.

HLF further objects that the request is overbroad and unduly burdensome.

HLF further objects that the request seeks documents not relevant and not reasonably calculated to lead to the discovery of admissible evidence.

HLF further objects that the request serves no purpose other than to harass the responding

1 party and the responding party's former client(s), and propounding party has not exhausted all
2 reasonable alternative means for obtaining the information sought. Many documents responsive
3 to this request are publicly available through the Court's public portal.

4 **REQUEST FOR PRODUCTION NO. 35:**

5 To the extent not responsive to any other request herein, all Documents related to the
6 Complaint [ECF No. 1], filed by ARIEL ABITTAN on December 24, 2020, in *Ariel Abittan*
7 *v. Temujin Labs Inc., et. al.*, United States District Court for the Northern District of
8 California, Case No. 20-cv-09340-NC.

9 **RESPONSE TO REQUEST FOR PRODUCTION NO. 35:**

10 HLF specifically incorporates by reference each of the general objections, objections to
11 definitions, and objections to instructions noted above as though they were fully set forth herein.

12 HLF further objects that this request improperly seeks clearly protected information from
13 prior opposing counsel, an action which the California courts have condemned as it "not only
14 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
15 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
16 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
17 quality of client representation. Counsel should be free to devote his or her time and efforts to
18 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
19 the 'chilling effect' that such practice will have on the truthful communications from the client to
20 the attorney is obvious." (*Id.*)

21 HLF further objects to the extent that the request seeks documents protected by the
22 attorney-client and/or attorney-work product privileges, and/or any other privileges.

23 HLF also objects to the extent that the request asks for confidential financial information
24 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
25 information protected by the right of privacy.

26 HLF further objects that the request is vague and ambiguous regarding the documents that
27 the request seeks.

28 HLF further objects that the request is overbroad and unduly burdensome.

1 HLF further objects that the request seeks documents not relevant and not reasonably
2 calculated to lead to the discovery of admissible evidence.

3 HLF further objects that the request serves no purpose other than to harass the responding
4 party and the responding party's former client(s), and propounding party has not exhausted all
5 reasonable alternative means for obtaining the information sought. Many documents responsive
6 to this request are publicly available through PACER.

7 **REQUEST FOR PRODUCTION NO. 36:**

8 To the extent not responsive to any other request herein, all Documents related to the
9 Complaint or Amended Complaint, filed by TEMUJIN LABS INC., a Delaware Corporation,
10 and TEMUJIN LABS INC., a Cayman Islands Corporation, on November 6, 2020, and
11 January 21, 2022, in *Temujin Labs Inc. v. Ariel Abittan, et al.*, Superior Court of California,
12 Santa Clara County, Case No. 20-cv-372622.

13 **RESPONSE TO REQUEST FOR PRODUCTION NO. 36:**

14 HLF specifically incorporates by reference each of the general objections, objections to
15 definitions, and objections to instructions noted above as though they were fully set forth herein.

16 HLF further objects that this request improperly seeks clearly protected information from
17 prior opposing counsel, an action which the California courts have condemned as it "not only
18 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
19 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
20 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
21 quality of client representation. Counsel should be free to devote his or her time and efforts to
22 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
23 the 'chilling effect' that such practice will have on the truthful communications from the client to
24 the attorney is obvious." (*Id.*)

25 HLF further objects to the extent that the request seeks documents protected by the
26 attorney-client and/or attorney-work product privileges, and/or any other privileges.

27 HLF also objects to the extent that the request asks for confidential financial information
28 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks

1 information protected by the right of privacy.

2 HLF further objects that the request is vague and ambiguous regarding the documents that
3 the request seeks.

4 HLF further objects that the request is overbroad and unduly burdensome.

5 HLF further objects that the request seeks documents not relevant and not reasonably
6 calculated to lead to the discovery of admissible evidence.

7 HLF further objects that the request serves no purpose other than to harass the responding
8 party and the responding party's former client(s), and propounding party has not exhausted all
9 reasonable alternative means for obtaining the information sought. Many documents responsive
10 to this request are publicly available through the Court's public portal.

11 **REQUEST FOR PRODUCTION NO. 37:**

12 To the extent not responsive to any other request herein, all Documents related to
13 the Cross-Complaint, filed by ARIEL ABITTAN, on November 3, 2021, in *Temujin Labs*
14 *Inc. v. Ariel Abittan, et al.*, Superior Court of California, Santa Clara County, Case No. 20-
15 cv-372622.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 37:**

17 HLF specifically incorporates by reference each of the general objections, objections to
18 definitions, and objections to instructions noted above as though they were fully set forth herein.

19 HLF further objects that this request improperly seeks clearly protected information from
20 prior opposing counsel, an action which the California courts have condemned as it "not only
21 disrupts the adversarial system and lowers the standard of the profession, but it also adds to the
22 already burdensome time and costs of litigation." (*Spectra-Physics, Inc. v. Superior Court*, 198
23 Cal.App.3d 1487, 1494 (1988).) "[T]he practice of deposing opposing counsel detracts from the
24 quality of client representation. Counsel should be free to devote his or her time and efforts to
25 preparing the client's case without fear of being interrogated by his or her opponent. Moreover,
26 the 'chilling effect' that such practice will have on the truthful communications from the client to
27 the attorney is obvious." (*Id.*)

28 HLF further objects to the extent that the request seeks documents protected by the

1 attorney-client and/or attorney-work product privileges, and/or any other privileges.

2 HLF also objects to the extent that the request asks for confidential financial information
3 protected by the taxpayer privilege. HLF further objects to this request to the extent it seeks
4 information protected by the right of privacy.

5 HLF further objects that the request is vague and ambiguous regarding the documents that
6 the request seeks.

7 HLF further objects that the request is overbroad and unduly burdensome.

8 HLF further objects that the request seeks documents not relevant and not reasonably
9 calculated to lead to the discovery of admissible evidence.

10 HLF further objects that the request serves no purpose other than to harass the responding
11 party and the responding party's former client(s), and propounding party has not exhausted all
12 reasonable alternative means for obtaining the information sought. Many documents responsive
13 to this request are publicly available through the Court's public portal.

14
15 DATED: May 24, 2023

HANSEN LAW FIRM, P.C.

16
17 By: /s/ Craig A. Hansen

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